UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

Via Email: Kevin_Kelly@AcushnetGolf.com
And First-Class Mail

November 22, 2016

Mr. Kevin Kelly
Acushnet Company
215 Duchaine Boulevard
New Bedford, MA 02745

Re: New Bedford Harbor Superfund Site
Transmittal of PCB Data for Property at
700 Belleville Avenue (Map 112 Lot 133)
New Bedford, MA 02745

Dear Mr. Kelly:

The purpose of this letter is to provide you with the results from the sediment and/or soil samples that were collected and analyzed for polychlorinated biphenyls (PCBs) from your property by the U.S. Environmental Protection Agency (EPA) in 2015. Your property lies within or abuts New Bedford Harbor, which is a federal Superfund Site.

The sampling and analysis was conducted by Battelle, under contract to the U.S. Army Corps of Engineers (ACOE), on behalf of the EPA. EPA and the Massachusetts Department of Environmental Protection (MassDEP) are working with the ACOE to delineate the nature and extent of PCB contamination within the New Bedford Harbor Superfund Site. The primary source of PCB contamination within the Harbor is the former Aerovox facility, located at 740 Belleville Avenue in New Bedford.

EPA's cleanup plan for the Site is described in a Record of Decision for the Upper and Lower Harbor issued in 1998, as modified ("ROD") (available at http://www3.epa.gov/region1/superfund/sites/newbedford/38206.pdf). Section X.B. and XIII of the ROD describes the cleanup approaches for intertidal sediment in areas along the Harbor with saltmarshes and areas where contact with sediment is not expected. Specific cleanup levels, described below, were set for shoreline cleanup of intertidal sediment and saltmarsh areas between the high and low tide water levels and to the first twelve inches of sediment depth.

Sampling Protocols:

On June 18, 2015, you granted EPA access to your property at 700 Belleville Avenue, New Bedford, MA (Map 112, Lot 133). Pursuant to this access agreement, EPA

contacted you prior to the initiation of the sampling efforts that were conducted on your property to notify you that Battelle would be performing the sampling. Battelle conducted the sampling on your property on August 4, 5, and 6, 2015.
The 2015 sediment samples were analyzed for total PCBs on-site using PCB immunoassay (IA) screening test kits, and a sub-set of the samples were analyzed at the Battelle laboratory using congener analysis. Congener analysis is a laboratory method that provides analytical results for 139 of the PCB congeners, and these are totaled for reporting the PCB data (the target 139 congeners represent over 95% of the total PCBs in the environment). The IA screening method provides PCB results with shorter analysis time but with less precision than the congener analysis. For the purpose of this data transmission, the IA results are reported as the total PCB data. However, to be conservative, EPA may apply an adjustment factor to IA-based PCB data in determining the extent of remediation. Historical data is often reported as the sum of 18 of the PCB congeners, referred to as the '18 NOAA congeners', multiplied by a correction factor. This represents laboratory analysis of 18 of the most prevalent PCB congeners which are totaled and then multiplied by a correction factor to estimate total PCBs.

The 2015 sampling effort was designed to address data gaps from historical sampling efforts and/or resample at historical sampling locations. Sample locations were focused in the intertidal area, between the mean-higher-high-water (MHHW) line and mean-lower-low-water (MLLW) line, where PCB-contaminated sediments of the Site are expected to be present potentially above applicable cleanup levels, although some sampling locations were taken above the MHHW line. Intertidal areas can become contaminated from PCBs in subtidal Harbor sediment during the twice-a-day tidal cycles. In addition, some other low-lying areas above the MHHW line may have been exposed to PCBs from subtidal sediment during periods of storms or floods.

Sampling Results for Your Property:

There were a total of 13 sampling locations that were sampled in 2015. The PCB levels in the top 1 foot ranged from 2.5 mg/kg to 2,885 mg/kg (historic PCB sampling data from 2000-2001 range from 46.8 mg/kg to 4,160 mg/kg). The sampling results for the 1-2 foot interval ranged from 0.7 to 1,767 mg/kg (historic PCB sampling data from 2000-2001 range from 8.8 mg/kg to 4,160 mg/kg). Sampling results for the 2-3 foot interval ranged from 0.8 mg/kg to 51.4 mg/kg (there was one historic PCB sampling result in this depth interval with a value of 8.06 mg/kg).

There were two sampling locations that were sampled in the 3-4 foot interval with results of 0.7 mg/kg and 1.0 mg/kg. One sample location from the 4-6.6 foot interval showed a result of 244 mg/kg. A figure and table of the 2015 PCB data and historical PCB data on your property is enclosed. For your reference, the figure shows the MHHW and MLLW lines and lot boundary information available through MassGIS and/or City parcel maps.

It is EPA's understanding that the current use of your property is commercial/industrial use. When the time for the intertidal cleanup approaches, as explained below, EPA will

take into account any changed use or reasonably anticipated future use of the property in determining the appropriate cleanup level.

Based on the current commercial/industrial use of the property and considering the enclosed data, PCB sampling results exceed the cleanup level for the current use of your property. These levels are likely the result of the property's location adjacent to the former Aerovox property and along the New Bedford Harbor shoreline. As noted above, the former Aerovox property was the primary source of PCB contamination to the Harbor, and the PCB contamination gradient in the sediment ranges from the highest levels in the northern end of the Site, decreasing from north to south away from the former Aerovox facility.

In addition, EPA is aware of recent soil data AVX collected on your property as part of its MassDEP 21E cleanup of the former Aerovox property. EPA's attached sampling results indicate PCB concentrations above the MHHW, that AVX may or may not be aware of at the various depths. Because AVX has proposed to address soil contamination in some areas of your property, **EPA would like to share the enclosed results with AVX for consideration and incorporation into its August 2016 Phase III Remedial Action Plan). We request that you contact Elaine Stanley, one of the EPA remedial project managers for the Site, within 10 days of receipt of this letter. Elaine can be reached at stanley.elainet@epa.gov or by phone at (617) 918-1332.** For your information, the AVX August 2016 Phase III Remedial Action Plan can be found on MassDEP's searchable sites website at this link: http://public.dep.state.ma.us/fileviewer/Default.aspx?formdataid=0&documentid=363678

Please note that EPA's sampling on your property was limited to PCBs, which is the primary contaminant being addressed by EPA's Harbor cleanup. There may be other pollutants or contaminants present at your property that are not related to the Harbor Site that may be regulated by the Commonwealth of Massachusetts.

Cleanup Levels:

Pursuant to the Site ROD (available at http://www3.epa.gov/region1/superfund/sites/newbedford/38206.pdf), for the intertidal/shoreline areas, the cleanup levels, to reduce risk from human contact with contaminated sediment, are the following:

- 1 mg/kg (or parts per million or "ppm") PCBs for areas bordering residential areas;
- 25 mg/kg (or ppm) PCBs for shoreline areas where beachcombing may occur; and
- 50 mg/kg (or ppm) PCBs for other shoreline areas with little or no public access and for saltmarshes. The Upper Harbor contains large fragile saltmarsh habitats which include ecologically important breeding, nursery, and feeding areas for aquatic life. EPA selected a 50 ppm PCBs cleanup level for saltmarshes with limited expected access to minimize adverse impacts to these marshes while still protecting against dermal contact/incidental ingestion risks to the occasional beachcomber.

Risks:

The human health risks at the Site are posed by ingestion of PCB-contaminated seafood, and dermal (skin) contact or incidental ingestion of PCB-contaminated sediment. A copy of EPA's seafood consumption advisories for the Site can be found at http://www.epa.gov/sites/production/files/2015-10/documents/583506.pdf.

As described in the ROD for the Site, the risks posed by exposure to PCB-contaminated sediment depends on the degree of exposure. The enclosed intertidal PCB sampling data are evaluated against the cleanup levels related to dermal contact and incidental ingestion risk. For additional detail on the basis for the intertidal/shoreline cleanup levels, see Appendix B of the ROD, available at http://www3.epa.gov/region1/superfund/sites/newbedford/38206.pdf] and Appendix D of the New Bedford Harbor Superfund Site 2015 Five-Year Review, available at http://www.epa.gov/sites/production/files/2015-10/documents/583507.pdf.

Ambient air PCB levels do not represent an unacceptable risk at the Site. EPA monitors ambient air pursuant to our ambient air monitoring plan available at http://www.epa.gov/sites/production/files/2015-08/documents/577154.pdf. Ambient air monitoring performed since prior to the initiation of EPA's dredging show that PCB levels in ambient air are well below levels of concern for chronic risks.

Potential Future Remediation of Your Property:

EPA will be in contact with you regarding whether future remedial work is necessary on your property, taking into account the MassDEP 21E cleanup currently being conducted by AVX, and to discuss the details and schedule for potential remedial work. Intertidal/shoreline remediation activities on your property are not expected to be initiated until 2018 or later, so we will likely not be contacting you until that time approaches. EPA and MassDEP, working with the ACOE, are continuing the New Bedford Harbor Superfund Site cleanup work, and the planning for remedial activities to address PCB-contaminated sediment in intertidal/shoreline areas is ongoing. The overall cleanup is planned to first address subtidal contamination before large-scale intertidal/shoreline remediation can occur, because tidal action may later recontaminate intertidal/shoreline properties.

What You Should Do to Minimize Exposure:

Elevated PCB levels are generally limited to the sediment below the MHHW such as drainage ditches or channels, low-lying mudflat and wetland areas and are generally limited to the top 1-2 feet of sediment. However, on your property, EPA has also identified contamination in adjacent soils above the MHHW elevation (see the attached figure). As the property owner, you should limit contact with sediment below the MHHW or on areas above the MHHW line on your property that may not have been temporarily capped or otherwise addressed by AVX or any other contaminated shoreline areas identified, and you should notify others, including any tenants, with access to your

property to do the same. Sediments/soils from these areas should not be excavated, disturbed or removed from the property without oversight by MassDEP and/or EPA.

Contact Information:

Representatives from EPA and MassDEP are available to meet with you to help explain the data enclosed with this letter. Please feel free to contact me at (617) 918-1754 or Kelsey O'Neil, the Site Community Involvement Coordinator, at (617) 918-1003 with any questions. If you have any legal questions, you or your counsel may contact Maximilian Boal at (617) 918-1750. For additional information, EPA has a webpage dedicated to the New Bedford Harbor Superfund Site at http://www.epa.gov/new-bedford-harbor. Thank you very much for your cooperation related to this investigation and for your time.

Sincerely,

Ginny Lombardo

Ginny Lombardo, Team Leader
New Bedford Harbor Superfund Site
Office of Site Restoration and Remediation
EPA Region 1

Enclosures

cc: Roland A. Giroux rolan_giroux@acushnetgolf.com (via email)
William J. Frye, VP, Golf Ball Operations, Acushnet Company (via First-Class Mail)
Joseph Coyne, joseph.coyne@state.ma.us (via email)
Elaine Stanley Stanley.elainet@epa.gov (via email)
Maximilian Boal boal.maximilian@epa.gov (via email)